

Message Text

PAGE 01 STATE 056867
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SUBJECT: ENVIRONMENT COMMITTEE AND NEA - COMMENTS ON
POLVANI REPORT AND ENV/EN/78.1

REF: STATE 302833

1. THE NEA GROUP OF EXPERTS' REPORT ON "OBJECTIVES,
CONCEPTS AND STRATEGIES FOR THE MANAGEMENT OF RADIOACTIVE
UNCLASSIFIED

PAGE 02 STATE 056867

WASTE ARISING FROM NUCLEAR POWER PROGRAMMES" (THE "POLVANI
REPORT") WILL BE REVIEWED DURING EARLY MARCH MEETINGS OF
THE ENVIRONMENT COMMITTEE'S ENERGY AND ENVIRONMENT STEERING
GROUP AND THE NEA'S WASTE MANAGEMENT COMMITTEE. COMMENTS
FROM THE FIRST MEETING WILL BE FORWARDED TO THE ENVIRONMENT
COMMITTEE (WHICH MEETS APRIL 24-26), WHICH WILL FORMULATE
ITS FINAL COMMENTS TO THE NEA STEERING COMMITTEE MEETING
IMMEDIATELY THEREAFTER. (IT WILL BE RECALLED THAT IN 1977
THE NEA SPECIFICALLY ASKED THE ENVIRONMENT COMMITTEE TO
REVIEW AND COMMENT ON THE POLVANI REPORT.) THE WASTE

MANAGEMENT COMMITTEE WILL, OF COURSE, MAKE ITS RECOMMENDATIONS DIRECT TO THE STEERING COMMITTEE.

2. WE HAVE EARLIER CABLED (REFTEL) SOME PRELIMINARY, GENERAL COMMENTS ON THE POLVANI REPORT FOR USE BY THE ENVIRONMENT DIRECTORATE IN PREPARING ITS DISCUSSION PAPER

(ENV/EN/78.1). MORE COMPREHENSIVE, AND SYSTEMATIC INTER-AGENCY COMMENTS ON BOTH THE REPORT AND THE ENVIRONMENT DIRECTORATE PAPER FOLLOW, FOR USE BY THE MISSION AND US DELS TO THE TWO EARLY MARCH SESSIONS. (MISSION REQUESTED TO PASS FOLLOWING TO D. SMITH - EPA, G. SHEPHERD - DOE, AND R. LIVINGSTON - EPA ON ARRIVAL.)

3. POLVANI REPORT - GENERAL COMMENTS:

-- THE REPORT MAKES NO REFERENCE TO THE INTERNATIONAL NUCLEAR FUEL CYCLE EVALUATION (INFCE) WHICH, INTER ALIA, WILL REVIEW SEVERAL OF THE ISSUES RAISED. THIS IS NATURAL IN VIEW OF THE TIMING OF THE REPORT, BUT NO US COMMENT IS COMPLETE WITHOUT AT LEAST REFERENCE TO INFCE AND ITS GOALS. (SEE ALSO COMMENT ON PARA 188(C), BELOW.)

UNCLASSIFIED

PAGE 03 STATE 056867

-- PRESENT KNOWLEDGE IS SUFFICIENTLY INCOMPLETE BOTH WITH REGARD TO THE EFFECTS OF DIRECT INTERACTION OF RADIATION WITH HUMANS AND ALL OTHER LIFE FORMS, AND WITH REGARD TO POSSIBLE NON-BIOLOGICAL EFFECTS AND POSSIBLE SYNERGISTIC EFFECTS, THAT IT IS PRUDENT TO MAINTAIN CONTAMINATION OF THE ENVIRONMENT WITH RADIATION AS LOW AS POSSIBLE. DILUTION AND DISPERSAL SHOULD THEREFORE BE RESTRICTED AND USED ONLY IF THE GOAL OF CONTAINMENT AND ISOLATION CANNOT BE REASONABLY ACHIEVED. THE REPORT FAILS TO CONSIDER THE CONTAINMENT AND ISOLATION APPROACH ADEQUATELY AND ITS APPARENT BIAS TOWARD DISPERSION (UNDER CERTAIN CIRCUMSTANCES) LEADS TO INAPPROPRIATE AND/OR CHALLENGEABLE CONCLUSIONS IN SEVERAL AREAS (SEE E.G., PARAS 35 AND 182(C)).

-- THE CHOICE AMONG WASTE MANAGEMENT OPTIONS ("THROW-AWAY" OR "FUEL REPROCESSING" AS OUTLINED BY THE REPORT) IS NOT ONE WHICH PRIMARILY HAS TO BE MADE ON TECHNICAL WASTE MANAGEMENT GROUNDS, SINCE BOTH PRESUMABLY CAN BE HANDLED WITH EXISTING OR DEVELOPABLE TECHNOLOGIES. OTHER, MORE GENERAL FACTORS CAN AND, WE BELIEVE, SHOULD BE DETERMINANT IN THE DECISION PROCESS. IN THIS REGARD, A THIRD OPTION, THE "STOWAWAY" OR RETRIEVABLE GEOLOGICAL STORAGE OPTION IS, OF COURSE, NOT EVEN CONSIDERED BY THE REPORT.

-- THE REPORT DEALS WITH THE ISSUE OF LONG-TERM HAZARDS ASSOCIATED WITH RADIOACTIVE WASTES IN A CURSORY MANNER. THIS IS PARTICULARLY TRUE IN RELATION TO, E.G., THE RE-

LEASE OF LONG-LIVED RADIONUCLIDES TO THE ENVIRONMENT AND THE PROBLEMS ASSOCIATED WITH MINING AND MILLING WASTES. A REALISTIC METHODOLOGY FOR TAKING LONG-TERM DOSE COMMITMENTS (OR HEALTH EFFECTS) INTO ACCOUNT IN COST-BENEFIT ANALYSES IS NOT YET COMPLETED. (SUCH A STUDY IS UNDERWAY IN THE NEA RADIATION PROTECTION AND PUBLIC

HEALTH COMMITTEE.)

UNCLASSIFIED

PAGE 04 STATE 056867

4. POLVANI REPORT - SPECIFIC COMMENTS (KEYED TO RECOMMENDATIONS CONTAINED IN PARAS 188 THRU 190):

-- 188 (A) - WE ENDORSE THE RECOMMENDATION, BUT BELIEVE IT IS PREMATURE FOR THE NEA TO SEEK TO UNDERTAKE ANY NEW EFFORT. MAJOR POLICY UNCERTAINTIES AND DISPARATE VIEWS EXIST IN MANY COUNTRIES. AN INTERNATIONAL STUDY THEREFORE WOULD LIKELY BE OF LIMITED VALUE IF UNDERTAKEN NOW, UNLESS IT COULD EFFECTIVELY ZERO IN ON FUTURE TRENDS AND DIRECTIONS. SUCH A STUDY ON THE LIABILITY ISSUE, HOWEVER, COULD WELL BE USEFUL.

-- 188(B) - THERE WOULD DEFINITELY BE UTILITY IN A TECHNICAL STUDY LAYING OUT THE PROS AND CONS, THE PLUSES AND MINUSES, OF ALTERNATIVE FINANCING POSSIBILITIES. WE WOULD NOT WANT SUCH A PROJECT TO GET INTO MAKING "POLITICAL" RECOMMENDATIONS, HOWEVER. CONCERNING DECOMMISSIONING, (AS IN OTHER AREAS) THE NEA SHOULD BE SURE TO COORDINATE WITH RELATED WORK BEING DONE BY THE IAEA.

-- 188(C) - THIS ACTIVITY SHOULD BE DEFERRED PENDING THE OUTCOME OF INFCE. AS NOTED PREVIOUSLY, THE REPORT DOES NOT EVEN CONSIDER ALL ALTERNATIVES, AND INFCE SEEKS TO COVER THE ENTIRE SUBJECT. HOWEVER, IT IS QUITE LIKELY THAT THERE WILL BE SOME WORK FOR THE NEA TO ACCOMPLISH IN THIS AREA AFTER AND AS A DIRECT RESULT OF INFCE PROGRAM RESULTS.

-- 188(D) - THIS IS NOT REALLY A RECOMMENDATION. THERE IS GOOD WORK GOING ON IN SOME AREAS ALREADY: WE NOTE AND ENDORSE ESPECIALLY THE NEA SPONSORED (NRC AND EPA HOSTED) MEETING ON MILL TAILINGS THIS JULY. THERE MAY BE SOME USEFUL FOLLOW-ON WORK WHICH WILL RESULT.

UNCLASSIFIED

PAGE 05 STATE 056867

-- 188(E) - THIS IS AN IMPORTANT AREA AND WE ENDORSE ONGOING WORK. HOWEVER, UNTIL THE NON-TECHNOLOGICAL SITUATION IS CLARIFIED, WE DO NOT SEE A ROLE FOR THE NEA OTHER THAN CONTINUING TO SEEK TO COORDINATE OTHERS' R, D, AND D AC-

TIVITIES, DISSEMINATE INFORMATION, ETC.

-- 188(F) - WE URGE THE RADIATION PROTECTION COMMITTEE TO START LOOKING AT RADIATION PROTECTION CRITERIA FOR DECOMMISSIONING. THERE ARE, IN ADDITION, MANY OTHER ISSUES (ECONOMIC, TECHNICAL, FORWARD FINANCING, ETC.) TO BE FOLDED IN EVENTUALLY, AND OTHER GROUPS SHOULD BE INVOLVED. LAST, WE THINK NATIONAL AUTHORITIES SHOULD MAKE RULES DESPITE THE PARAGRAPH'S STATEMENT TO THE CONTRARY.

-- 189 - THIS IS MERELY A STATEMENT OF PRINCIPLE, BUT WE HAVE SOME DIFFICULTY WITH THE PENULTIMATE SENTENCE DEALING WITH "LIMITED QUANTITIES OF RADIOACTIVE WASTE." WE WOULD URGE THAT ANY SUCH ACTIVITIES BE UNDERTAKEN WITH CAUTION AND CAREFUL ADVANCE PLANNING, CONSIDERATION OF WHAT THE EXPECTED BENEFITS ARE, AND WEIGHING OF THE POTENTIAL BENEFITS AGAINST THE COSTS.

-- 190 - WE SUPPORT THE CONCEPT, BUT RECOGNIZE THE COMPLEXITY AND RESOURCE REQUIREMENTS OF ANY SUCH ACTIVITY. ANYTHING UNDERTAKEN UNDER THIS RUBRIC SHOULD BE WELL THOUGHTOUT, COORDINATED WITH OTHERS' WORK IN THE FIELD, AND PROCEED SLOWLY, COMMENSURATE WITH THE EXPECTED BENEFITS.

5. ENV/EN/78.1 - COMMENT ON SECTION 4 (PAGE 6): WE STRONGLY SUPPORT THE CONCEPT OF COOPERATION BETWEEN THE ENVIRONMENT COMMITTEE AND THE NEA. CONCERNING MODALITIES, WE SUGGEST THAT THE ENVIRONMENT COMMITTEE DEAL IN THE FIRST INSTANCE WITH THE APPROPRIATE COMMITTEES OF THE NEA (E.G., RAD WASTE) ON ISSUES OF MUTUAL INTEREST. AS AND IF ISSUES OF POLICY REMAIN UNRESOLVED AT THAT LEVEL, UNCLASSIFIED

PAGE 06 STATE 056867

IT WOULD OBVIOUSLY THEN BE APPROPRIATE FOR THE ENVIRONMENT COMMITTEE AND NEA STEERING COMMITTEE TO SEEK TO RESOLVE THEM.

6. ENV/EN/78.1 - COMMENTS KEYED TO THE SPECIFIC POINTS RAISED IN SECTION 5:

-- (I) - WE STRONGLY SUPPORT THIS PROPOSED ACTIVITY, NOTING THAT IT HAS BEEN REQUESTED BY NEA.

-- (II) - WE STRONGLY SUPPORT THIS ONE ALSO, PARTICULARLY IN REGARD TO OCEAN DUMPING SITES. THE US BELIEVES THAT MONITORING SHOULD BE STARTED. THE ENVIRONMENT COMMITTEE SHOULD SEEK TO DEFINE WHAT CAN AND SHOULD BE DONE AND DEVELOP CRITERIA. (RECOGNIZING THE PROBLEM OUTLINED IN ENV/EN/77.20, WE NONETHELESS BELIEVE THAT A START CAN BE MADE. EVERYTHING DOES NOT HAVE TO BE DONE IN ONE BIG JUMP.)

-- (III) - SEE COMMENT ON PARA 190 IN POLVANI REPORT.
NONETHELESS, WE SUPPORT THE ENVIRONMENT COMMITTEE PLAYING
A POLICY GUIDANCE ROLE. CERTAIN ECONOMIC STUDIES MIGHT BE
APPROPRIATELY UNDERTAKEN AS WELL.

-- (IV) - WHILE IT IS NOT FOR THE ENVIRONMENT COMMITTEE TO
UNDERTAKE SUCH DEMONSTRATION, IT COULD USEFULLY START
WORKING ON CRITERIA FOR CREDIBLE DEMONSTRATIONS WHICH
WOULD MERGE WITH THE TECHNICAL CRITERIA OTHERS WOULD
DEVELOP. THAT IS, WORKING IN COOPERATION WITH THE NEA,
IT COULD DEVELOP A CHECK LIST FOR WHAT CONSTITUTES
CREDIBILITY (IN THE SOCIAL IMPACTS AREA, NOT TECHNICAL).

-- (V) - THIS WOULD BE USEFUL WORK IF IT COULD BE PURSUED
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PAGE 07 STATE 056867

BY APPROPRIATE EXPERTS, ESCHEWING THE SOMETIMES ARCANE,
LEGALISTIC WORK OF THE TFP GROUP AND TAKING PRACTICAL
APPROACHES AS THE PARA IMPLIES.

-- (VI) - WE FIND THIS A VERY GOOD PROPOSAL, BUT REFER
BACK TO THE COMMENT ON POLVANI PARAGRAPH 188(F) CONCERNING
THE ROLE OF THE RADIATION PROTECTION COMMITTEE. WE SUP-
PORT THE SUGGESTION IN THE SECOND PARAGRAPH. VANCE

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